

MINGGUO CHO, (Pro Se)
Residence & P.O. Address
11-29 30th Drive
Astoria, NY 11102
Tel: (917) 406-9270

20-CV-2846
KOVNER, J.
BLOOM, M.J

IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF NEW YORK

MINGGUO CHO,

Plaintiff,

-v-

**DONALD J. TRUMP and THE UNITED
STATES OF AMERICA,**

Defendants.

Docket No.

COMPLAINT

Plaintiff Demands
a Trial by Jury

Plaintiff, Mingguo Cho, acting in a pro se capacity, as and for his complaint,
alleges as follows:

PARTIES AND JURISDICTION

1. Plaintiff resides at 11-29 30th Drive, First Floor, Astoria, NY 11102.
2. Defendants, **Donald J. Trump**, the President of the United States of America, and the **United States of America**, (1600 Pennsylvania Avenue N.W., Washington, D.C. 20500) are entities against whom, and which claims may be brought, for deprivation of one's civil rights including, but not limited to, plaintiff's claim that he has been deprived of constitutional rights under the First Amendment including his right to freedom of speech.
3. Jurisdiction is claimed (1) under the 14th Amendment to the United

States Constitution and Title 42, Chapter 21, Subchapter I, Section 1983 upon the ground that every person who, under color of any statute, ordinance, regulation, custom, or usage, of any State or Territory . . . subjects . . . any citizen of the United States to the deprivation of any rights, privileges, or immunities secured by the Constitution and laws, shall be liable to the party injured in an action at law and (2) under 28 U.S.C. §1332 on the ground of diversity of citizenship, plus the amount in controversy being more than the threshold.

PLAINTIFF'S BACKGROUND

4. Although plaintiff has a formal educational background in engineering, plaintiff has extended his expertise and knowledge into the area of "Qi-Kong" (energy function) which has enabled him to discover a "life energy system" contained in the bodies of all human beings. The life energy system and its workings have not previously been mentioned in Western medical publications dealing with anatomy. But the life energy function is well-known and publicized in Far Eastern medical books (especially Chinese) and has been used to identify the etiology and treatment of virtually all diseases.

5. As a result of plaintiff's aforesaid discovery, plaintiff has been able to identify, treat and cure many diseases which are commonly labelled at the present time as being "incurable" including, but not limited to, LUPUS, AIDS and COVID-19.

6. Plaintiff's expertise especially in the field of AIDS is documented in a book authored by him about 20 years ago, but the book remains unpublished by reason of a conspiracy to deny authors and health providers not formally educated as medical doctors the opportunity to have their works published - if the subject matter

relates to cures for diseases. The conspiracy has denied plaintiff who is a citizen of the United States, his rights, privileges, and immunities as guaranteed by the United States and New York State Constitutions and laws.

7. Plaintiff also attempted to share his vast knowledge through the creation of a medical website, www.mingguo.com, wherein the public was invited to mail-in copies of their medical charts and treatment history for further evaluation whereupon a suggested cure would be transmitted to them. The website effort at making plaintiff's vast knowledge accessible to the public was undertaken for the benefit of the human race, but the general public is not benefitting from plaintiff's efforts to cure diseases based upon both "Qi-Kong" (energy function) and a combination of traditional Chinese herbs because of a vast institutionalized conspiracy to slander health providers who do not have medical degrees. The conspiracy and both actions and omissions by defendants and their servants, agents and employees have denied plaintiff, who is a citizen of the United States, his rights, privileges, and immunities as guaranteed by the United States and New York State Constitutions and laws including, but not limited to, the right to free speech.

8. The institutionalized denigration is exemplified by plaintiff's efforts to offer cures for illnesses with all such efforts being rejected by these defendants and all federal and state governments. For the most part, there is a conspiratorial failure to even acknowledge plaintiff's efforts based upon a prejudicial thinking that any cures for diseases offered by nonmedical personnel are not worthy of consideration.

9. The institutionalized denigration is also exemplified by plaintiff's commendable efforts in offering cures for specified diseases to hospitals, medical

schools and medical professionals. But again, all efforts by plaintiff are rejected either outright or through the simple expedient of failing to answer or act on his cure offers. The conspiracy of the defendants in association with other individuals and entities has denied plaintiff, who is a citizen of the United States, his rights, privileges, and immunities as guaranteed by the United States and New York State Constitutions and laws.

10. Many recipients of plaintiff's offers for cures do not even bother to read plaintiff's essays or book drafts although, if they had, they would reach the conclusion set forth in Chinese medical books to the effect that ***"there is no incurable disease, only diseases which are too late to cure"*** - such as Alzheimers disease, cancer and multiple sclerosis.

11. This institutionalized prejudice and denigration against health providers lacking medical degrees is encouraged and promoted by the government of the United States as well as its agencies and the President as part of a vast conspiracy with drug companies, medical doctors, hospitals and others. All of these entities attempt to persuade the general public to view nonmedical health providers as "crazies", "quacks" or charlatans so that their domination and unlawful monopolistic practices in the health field area are not endangered or jeopardized.

12. The effect of this conspiracy is to deny both the general public and United States citizens the option to choose 4,000 year-old, proven remedies inspired by Chinese medicines as well as the cures inherent in the "life energy system" created by plaintiff.

13. The benefits to be derived by the general public and United States

citizens if traditional Chinese medicines and the "life energy system" were made available are enormous including among other things, (a) cures for diseases which were previously thought to be incurable, (b) substantially reduced medical and hospital provider costs, (c) substantially reduced costs for medical insurance and (d) actual cures being effected for many diseases in remarkably short periods of time.

14. Plaintiff has personally counselled many persons of ill health toward the benefits of traditional Chinese medicines and the "life energy system" with remarkable results including the total cure of LUPUS patients. Plaintiff has 40+ years' experience in the field of traditional Chinese medicine and actually developed his life energy system about 30 years ago but the conspiracy fostered, engendered and promoted by defendants has prevented him from sharing his discoveries with the general public so that millions of persons could benefit therefrom.

15. Because of the unlawful monopoly granted either outright or de facto by defendants, their subdivisions, agents and employees to licensed health and/or medical professionals and others similarly situated and other discriminatory policies, plaintiff is thereby denied his constitutional right to speak out, present and even advertise his revolutionary discovery which would protect the lives of millions of people. The conspiracy of defendants in association with other individuals and entities has denied plaintiff, who is a citizen of the United States, his rights, privileges, and immunities as guaranteed by the United States and New York State Constitutions and laws.

16. With respect to the unlawful actions and omissions attributable to Donald J. Trump who conspired with all of the aforementioned governmental agencies, health

providers, drug companies, etc. in an effort to deprive plaintiff of his rights, they were undertaken by Donald J. Trump as President of the United States.

COVID-19

17. The COVID-19 pandemic has reaked havoc throughout the world in all aspects of life. The number of infections continues to rise, hospitals and health care facilities are overwhelmed, business are shuttered, people are wearing protective gear such as masks, head coverings, and gloves, families are isolated in their homes. and deaths are rising. Infected people cannot get medicine and admission to hospitals is being severely restricted. Billions of dollars have been and will be spent in attempts to discover a cure. The matter is extremely urgent if society and governments wish to bring normality back to the world.

18. The solution to the pandemic - which complainant is offering to the world without seeking patent protection - is garlic. This herb is grown in all parts of the world, is readily available and is already known to help cure diseases especially in the blood system where COVID-19 attacks. But the U.S. Food & Drug Administration is suppressing this wonder drug for COVID-19 by falsely cautioning the public not to look for miracles to cure COVID-19 in the short run. As a result, the public has ignored plaintiff's advertising of this cure (at a cost of \$10,000) in newspapers and on the internet.

19. Plaintiff has discovered a cure which is 100% effective against the treacherous COVID-19 disease. That cure is garlic soup. Moreover, with proper treatment, a cure can be accomplished within 3-4 days at a cost of \$10 or less.

20. The basic formula is as follows:

- a) Take one piece of garlic (10 flats) and then slice each flat into 5 pieces each for a total of 50 slices;
- b) put the slices into a coffee cup with water and then microwave for one minute;
- c) drink the contents of the cup all at once.
(if the patient believes the solution is too spicy, a teaspoon of sugar may be added).

21. In the event of coughing, the formula is as follows:

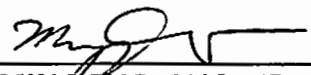
- a) take 6 pieces of the existing Chinese herbal medicine, garcinia, 4 times per day. (One day should be sufficient for cure) An alternate to garcinia is andrographis paniculata.
- b) if there is "stiffness", head, neck and/or back ache, tylenol can be taken, 650 mg every 12 hours.

22. In the event of serious consequences such as lung damage, a general formula for relief and probable cure would be 120mg of Biota tops, 160mg honey suckle, 80mg subprostrate sophora root, 80mg of cotoneaster vegetable root, 20mg of horsebezoar, and 80mg forsythia fruit placed into a large pot, add 10 cups of water, cook until boiled, then reduce the flame for 50 minutes. There will be 3 cups of the soup remaining and a person should drink one cup every 8 hours for one day. The same soup and dosage should be repeated from 3 to 12 days as necessary.

WHEREFORE, plaintiff demands judgment against both defendants for (1) \$10 million in damages, plus (2) One billion (\$1,000,000,000) dollars in punitive damages, plus (3) an award of the costs and disbursements of this action. In addition, plaintiff demands a mandatory injunction that all persons in the United States and throughout the world be compelled to ingest garlic soup to stop the COVID-19 spread, that doctors, health personnel, medical school personnel, and pharmaceutical companies

be required to learn and teach the benefits of garlic soup. In addition, plaintiff demands a restructuring of the entire medical system in the United States to enjoin federal, state and local governments from preventing non-licensed persons from publicizing, offering and administering their proven cures to the public,

Dated: New York, New York
June 26, 2020

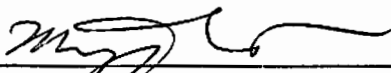

MINGGUO CHO, (Pro Se)

Certification and Closing

Under Federal Rules of Civil Procedure 11, by signing below, I certify to the best of my knowledge, information and belief that this complaint: (1) is not presented for an improper purpose, such as to harass, cause unnecessary delay, or needlessly increase the cost of litigation; (2) is supported by existing law or by a nonfrivolous argument for extending, modifying, or reversing existing law; (3) the factual contentions have evidentiary support or, if specifically, so identified, will likely have evidentiary support after a reasonable opportunity for further investigation or discovery; and (4) the complaint otherwise complies with the requirements of Rule 11.

I agree to provide the Clerk's Office with any changes to my address where case-related papers may be served. I understand that my failure to keep a current address on file with the Clerk's Office may result in a dismissal of my case.

Date of Signing: June 26, 2020


(Signature of Plaintiff)

MINGGUO CHO

Docket No.
IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF NEW YORK

MINGGUO CHO,

Plaintiff,

-v-

**DONALD J. TRUMP and THE UNITED
STATES OF AMERICA,**

Defendants.

SUMMONS AND COMPLAINT

MINGGUO CHO, (Pro Se)
Residence & P.O. Address
11-29 30th Drive
Astoria, NY 11102
Tel:(917) 406-9270

CIVIL COVER SHEET

The JS 44 civil cover sheet and the information contained herein neither replace nor supplement the filing and service of pleadings or other papers as required by law, except as provided by local rules of court. This form, approved by the Judicial Conference of the United States in September 1974, is required for the use of the Clerk of Court for the purpose of initiating the civil docket sheet. (SEE INSTRUCTIONS ON NEXT PAGE OF THIS FORM.)

I. (a) PLAINTIFFS

MINGGUO CHO

DEFENDANTS

DONALD J. TRUMP and UNITED STATES OF AMERICA

(b) County of Residence of First Listed Plaintiff Queens
(EXCEPT IN U.S. PLAINTIFF CASES)

County of Residence of First Listed Defendant _____
(IN U.S. PLAINTIFF CASES ONLY)

NOTE: IN LAND CONDEMNATION CASES, USE THE LOCATION OF THE TRACT OF LAND INVOLVED.

(c) Attorneys (Firm Name, Address, and Telephone Number)

Attorneys (If Known)

II. BASIS OF JURISDICTION (Place an "X" in One Box Only)

- ☐ 1 U.S. Government Plaintiff
- ☐ 3 Federal Question (U.S. Government Not a Party)
- ☒ 2 U.S. Government Defendant
- ☐ 4 Diversity (Indicate Citizenship of Parties in Item III)

III. CITIZENSHIP OF PRINCIPAL PARTIES (Place an "X" in One Box for Plaintiff and One Box for Defendant)

- | | PTF | DEF | | PTF | DEF |
|---|---------------------------------------|----------------------------|---|----------------------------|----------------------------|
| Citizen of This State | <input checked="" type="checkbox"/> 1 | <input type="checkbox"/> 1 | Incorporated or Principal Place of Business In This State | <input type="checkbox"/> 4 | <input type="checkbox"/> 4 |
| Citizen of Another State | <input type="checkbox"/> 2 | <input type="checkbox"/> 2 | Incorporated and Principal Place of Business In Another State | <input type="checkbox"/> 5 | <input type="checkbox"/> 5 |
| Citizen or Subject of a Foreign Country | <input type="checkbox"/> 3 | <input type="checkbox"/> 3 | Foreign Nation | <input type="checkbox"/> 6 | <input type="checkbox"/> 6 |

IV. NATURE OF SUIT (Place an "X" in One Box Only)

CONTRACT	TORTS	FORFEITURE/PENALTY	BANKRUPTCY	OTHER STATUTES	
<input type="checkbox"/> 110 Insurance <input type="checkbox"/> 120 Marine <input type="checkbox"/> 130 Motor Act <input type="checkbox"/> 140 Negotiable Instrument <input type="checkbox"/> 150 Recovery of Overpayment & Enforcement of Judgment <input type="checkbox"/> 151 Medicare Act <input type="checkbox"/> 152 Recovery of Defaulted Student Loans (Excludes Veterans) <input type="checkbox"/> 153 Recovery of Overpayment of Veteran's Benefits <input type="checkbox"/> 160 Stockholders' Suits <input type="checkbox"/> 190 Other Contract <input type="checkbox"/> 195 Contract Product Liability <input type="checkbox"/> 196 Franchise	PERSONAL INJURY <input type="checkbox"/> 310 Airplane <input type="checkbox"/> 315 Airplane Product Liability <input type="checkbox"/> 320 Assault, Libel & Slander <input type="checkbox"/> 330 Federal Employers' Liability <input type="checkbox"/> 340 Marine <input type="checkbox"/> 345 Marine Product Liability <input type="checkbox"/> 350 Motor Vehicle <input type="checkbox"/> 355 Motor Vehicle Product Liability <input type="checkbox"/> 360 Other Personal Injury <input type="checkbox"/> 362 Personal Injury - Medical Malpractice	PERSONAL INJURY <input type="checkbox"/> 365 Personal Injury - Product Liability <input type="checkbox"/> 367 Health Care/Pharmaceutical Personal Injury Product Liability <input type="checkbox"/> 368 Asbestos Personal Injury Product Liability PERSONAL PROPERTY <input type="checkbox"/> 370 Other Fraud <input type="checkbox"/> 371 Truth in Lending <input type="checkbox"/> 380 Other Personal Property Damage <input type="checkbox"/> 385 Property Damage Product Liability	<input type="checkbox"/> 625 Drug Related Seizure of Property 21 USC 881 <input type="checkbox"/> 690 Other LABOR <input type="checkbox"/> 710 Fair Labor Standards Act <input type="checkbox"/> 720 Labor/Management Relations <input type="checkbox"/> 740 Railway Labor Act <input type="checkbox"/> 751 Family and Medical Leave Act <input type="checkbox"/> 790 Other Labor Litigation <input type="checkbox"/> 791 Employee Retirement Income Security Act IMMIGRATION <input type="checkbox"/> 462 Naturalization Application <input type="checkbox"/> 465 Other Immigration Actions	<input type="checkbox"/> 422 Appeal 28 USC 158 <input type="checkbox"/> 423 Withdrawal 28 USC 157 PROPERTY RIGHTS <input type="checkbox"/> 820 Copyrights <input type="checkbox"/> 830 Patent <input type="checkbox"/> 840 Trademark SOCIAL SECURITY <input type="checkbox"/> 861 HIA (1395ff) <input type="checkbox"/> 862 Black Lung (923) <input type="checkbox"/> 863 DIWC/DIWW (405(g)) <input type="checkbox"/> 864 SSID Title XVI <input type="checkbox"/> 865 RSI (405(g)) FEDERAL TAX SUITS <input type="checkbox"/> 870 Taxes (U.S. Plaintiff or Defendant) <input type="checkbox"/> 871 IRS—Third Party 26 USC 7609	<input type="checkbox"/> 375 False Claim Act <input type="checkbox"/> 376 Qui Tam (31 USC 3729(a)) <input type="checkbox"/> 400 State Reapportionment <input type="checkbox"/> 410 Antitrust <input type="checkbox"/> 430 Banks and Banking <input type="checkbox"/> 450 Commerce <input type="checkbox"/> 460 Deportation <input type="checkbox"/> 470 Racketeer Influenced and Corrupt Organizations <input type="checkbox"/> 480 Consumer Credit <input type="checkbox"/> 490 Cable/Sat TV <input type="checkbox"/> 850 Securities/Commodities/Exchange <input checked="" type="checkbox"/> 890 Other Statutory Actions <input type="checkbox"/> 891 Agricultural Acts <input type="checkbox"/> 893 Environmental Matters <input type="checkbox"/> 895 Freedom of Information Act <input type="checkbox"/> 896 Arbitration <input type="checkbox"/> 899 Administrative Procedure Act/Review or Appeal of Agency Decision <input type="checkbox"/> 900 Constitutionality of State Statutes
REAL PROPERTY <input type="checkbox"/> 210 Land Condemnation <input type="checkbox"/> 220 Foreclosure <input type="checkbox"/> 230 Rent Lease & Ejectment <input type="checkbox"/> 240 Torts to Land <input type="checkbox"/> 245 Tort Product Liability <input type="checkbox"/> 290 All Other Real Property	CIVIL RIGHTS <input type="checkbox"/> 440 Other Civil Rights <input type="checkbox"/> 441 Voting <input type="checkbox"/> 442 Employment <input type="checkbox"/> 443 Housing/Accommodations <input type="checkbox"/> 445 Amer. w/Disabilities - Employment <input type="checkbox"/> 446 Amer. w/Disabilities - Other <input type="checkbox"/> 448 Education	PRISONER PETITIONS Haheas Corpus: <input type="checkbox"/> 463 Alien Detainee <input type="checkbox"/> 510 Motions to Vacate Sentence <input type="checkbox"/> 530 General <input type="checkbox"/> 535 Death Penalty <input type="checkbox"/> 540 Mandamus & Other <input type="checkbox"/> 550 Civil Rights <input type="checkbox"/> 555 Prison Condition <input type="checkbox"/> 560 Civil Detainee - Conditions of Confinement			

V. ORIGIN (Place an "X" in One Box Only)

- ☒ 1 Original Proceeding
- ☐ 2 Removed from State Court
- ☐ 3 Remanded from Appellate Court
- ☐ 4 Reinstated or Reopened
- ☐ 5 Transferred from Another District (specify)
- ☐ 6 Multidistrict Litigation

VI. CAUSE OF ACTION

Cite the U.S. Civil Statute under which you are filing (Do not cite jurisdictional statutes unless diversity):
14th Amendment, 28 U.S.C. 1332

Brief description of cause:
Conspiracy to deny citizens their Constitutional Rights

VII. REQUESTED IN COMPLAINT:

☐ CHECK IF THIS IS A CLASS ACTION UNDER RULE 23, F.R.Cv.P.

DEMAND \$ _____

CHECK YES only if demanded in complaint:
JURY DEMAND: ☒ Yes ☐ No

VIII. RELATED CASE(S) IF ANY

(See instructions):

JUDGE none

DOCKET NUMBER _____

DATE
06/25/2020

SIGNATURE OF ATTORNEY OF RECORD

FOR OFFICE USE ONLY

RECEIPT # _____ AMOUNT _____ APPLYING IFP _____ JUDGE _____ MAG. JUDGE _____

CERTIFICATION OF ARBITRATION ELIGIBILITY

Local Arbitration Rule 83.7 provides that with certain exceptions, actions seeking money damages only in an amount not in excess of \$150,000, exclusive of interest and costs, are eligible for compulsory arbitration. The amount of damages is presumed to be below the threshold amount unless a certification to the contrary is filed.

Case is Eligible for Arbitration ☐

I, _____, counsel for _____, do hereby certify that the above captioned civil action is ineligible for compulsory arbitration for the following reason(s):

☐

☐

☐

monetary damages sought are in excess of \$150,000, exclusive of interest and costs,

the complaint seeks injunctive relief,

the matter is otherwise ineligible for the following reason

DISCLOSURE STATEMENT - FEDERAL RULES CIVIL PROCEDURE 7.1

Identify any parent corporation and any publicly held corporation that owns 10% or more of its stocks:

RELATED CASE STATEMENT (Section VIII on the Front of this Form)

Please list all cases that are arguably related pursuant to Division of Business Rule 50.3.1 in Section VIII on the front of this form. Rule 50.3.1 (a) provides that "A civil case is "related" to another civil case for purposes of this guideline when, because of the similarity of facts and legal issues or because the cases arise from the same transactions or events, a substantial saving of judicial resources is likely to result from assigning both cases to the same judge and magistrate judge." Rule 50.3.1 (b) provides that "A civil case shall not be deemed "related" to another civil case merely because the civil case: (A) involves identical legal issues, or (B) involves the same parties." Rule 50.3.1 (c) further provides that "Presumptively, and subject to the power of a judge to determine otherwise pursuant to paragraph (d), civil cases shall not be deemed to be "related" unless both cases are still pending before the court."

NY-E DIVISION OF BUSINESS RULE 50.1(d)(2)

- 1.) Is the civil action being filed in the Eastern District removed from a New York State Court located in Nassau or Suffolk County? ☐ Yes ☒ No
- 2.) If you answered "no" above:
- a) Did the events or omissions giving rise to the claim or claims, or a substantial part thereof, occur in Nassau or Suffolk County? ☐ Yes ☒ No
- b) Did the events or omissions giving rise to the claim or claims, or a substantial part thereof, occur in the Eastern District? ☒ Yes ☐ No
- c) If this is a Fair Debt Collection Practice Act case, specify the County in which the offending communication was received:

If your answer to question 2 (b) is "No," does the defendant (or a majority of the defendants, if there is more than one) reside in Nassau or Suffolk County, or, in an interpleader action, does the claimant (or a majority of the claimants, if there is more than one) reside in Nassau or Suffolk County? ☐ Yes ☐ No

(Note: A corporation shall be considered a resident of the County in which it has the most significant contacts).

BAR ADMISSION

I am currently admitted in the Eastern District of New York and currently a member in good standing of the bar of this court.

☐ Yes ☐ No

Are you currently the subject of any disciplinary action (s) in this or any other state or federal court?

☐ Yes (If yes, please explain) ☐ No

I certify the accuracy of all information provided above.

Signature: _____

Signature of Clerk or Deputy Clerk

Civil Action No. _____

PROOF OF SERVICE

(This section should not be filed with the court unless required by Fed. R. Civ. P. 4 (l))

This summons for *(name of individual and title, if any)* _____
was received by me on *(date)* _____.

☐ I personally served the summons on the individual at *(place)* _____
_____ on *(date)* _____; or

☐ I left the summons at the individual's residence or usual place of abode with *(name)* _____
_____, a person of suitable age and discretion who resides there,
on *(date)* _____, and mailed a copy to the individual's last known address; or

☐ I served the summons on *(name of individual)* _____, who is
designated by law to accept service of process on behalf of *(name of organization)* _____
_____ on *(date)* _____; or

☐ I returned the summons unexecuted because _____; or

☐ Other *(specify)*:

My fees are \$ _____ for travel and \$ _____ for services, for a total of \$ _____ 0.00.

I declare under penalty of perjury that this information is true.

Date: _____

Server's signature

Printed name and title

Server's address

Additional information regarding attempted service, etc:

★FILED★

2020 JUN 25 PM 1:38

U.S. DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

